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March 9, 2017

VIA, ELECTRONIC FILING

The Honorable Jocelyn Boyd
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: • **Docket Number 2016-8-E**
• **Petition to Intervene**

Dear Ms. Boyd:

Enclosed for filing is Petitioner Adger Solar, LLC's Petition to Intervene, Cover Sheet and Certificate of Service.

All parties of record have been served. Please notify the undersigned if you there is anything else you may need.

Respectfully Submitted,

/S/ _____
Richard L. Whitt

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**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2016-8-E**

IN RE: Duke Energy Progress, LLC's
Integrated Resource Plan (IRP)

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**PETITION
TO
INTERVENE**

INTRODUCTION

On November 1, 2016, Duke Energy Progress, LLC, ("DEP"), through counsel, filed its annual Integrated Resource Plan ("IRP"), Report in Commission Docket 2016-8-E. Petitioner herein is Adger Solar, LLC. This Petition to Intervene is filed pursuant to R. 103-825, of this Commission's Rules and Regulations and other applicable Rules and Regulations. Petitioner seeks approval to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

PETITIONER

Adger Solar, LLC.

1. Adger Solar, LLC is a utility-scale solar development firm based in Bluffton, South Carolina, ("Adger Solar"). Adger Solar has been active in South Carolina since 2014 and currently has over 500 MW of solar farms under development in South Carolina. The Adger Solar management team and its investors have led the development of over 9,000 MW of operating utility-scale wind and solar projects in the United States.

2. Adger Solar is a clean energy development company focused on creating lower-cost, utility-scale solar-electric generating facilities, with developments underway in six different South Carolina Counties. Adger Solar is a joint venture with one of the nation's oldest private energy investors, which has participated in the financing and development of more than 10,000 megawatts of wind and solar projects now in operation around the country.

3. Additionally, Adger Solar is in the process of developing a two hundred million dollar project in Clarendon County, South Carolina, consisting of two separate solar farm projects. Together, these two proposed projects in Clarendon County, South Carolina, will generate enough electricity to supply approximately 25,000 homes on an average annual basis.
Request for Intervenor Status.

4. Adger Solar is financially impacted by DEP's filing, as is outlined in more detail herein.

5. Specifically, Petitioner Adger Solar plans to conduct, business in DEP's assigned territory, including sales to DEP's Consumers and Petitioner has a material interest in DEP's filing.

6. Petitioner herein, Adger Solar, currently has a Petition to Intervene pending with this Commission in Docket 2017-1-E.

DEP'S Filing.

7. DEP's filing of DEP's Report and annual update to its IRP, was made pursuant to § 58-37-40, S.C. Code Ann., (1976, as amended) and Commission Order No. 1998-502.

8. DEP's annual IRP filing outlines potential infrastructure which will be needed to match DEP's forecasted electricity requirements. DEP's IRP filing should contain a demand and energy forecast and the utility's acceptable plan for meeting DEP's forecast requirements.

9. As outlined herein, Petitioner has substantial business interests in DEP's assigned territory in South Carolina.

10. Petitioner's position is that Petitioner has a direct and substantial interest in this Docket, concerning this Commission's review of DEP's filing in South Carolina and Petitioner's interests cannot be adequately addressed by any other party. Petitioner's further position is that Petitioner will be impacted by DEP's IRP planning, which necessarily influences DEP's decision making, concerning demand-side and supply-side resources and those decisions impact the cost of electricity for South Carolina consumers. Therefore, the specifics of DEP's IRP are important to Petitioner from a financial standpoint. Petitioner's further position is that Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important issue raised in this Docket. As shown above, Petitioner has a direct and material interest in DEP's filing, and this Commission's review.

11. This Commission contemplated intervention in IRP filings, as stated in this Commission's Order No. 2012-95. This Petition to Intervene is timely filed with this Commission.

12. Furthermore, Petitioner's Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before the Commission, and [Intervention] [is] allowed so that a full and complete record addressing...views and concerns can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

13. Petitioner should be allowed to intervene in this Docket, with full rights of cross examination, discovery and participation in any Hearing to be scheduled in this Docket.

PETITION TO INTERVENE

14. The granting of Adger Solar, LLC's Petition to Intervene is (i) in the public interest (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed and (iii) contemplated in this Commission's Order 2012-95.

15. Adger Solar LLC is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

(a) That this Petition to Intervene be accepted and that Petitioner, Adger Solar, LLC be made a party of record;

(b) That Petitioner, Adger Solar, LLC be allowed to participate fully in this proceeding and take such positions as it deems advisable; and

(c) For such other and further relief as is just and proper.

Respectfully Submitted,

/S/

Richard L. Whitt,

AUSTIN & ROGERS, P.A.,

508 Hampton Street, Suite 300

Columbia South Carolina, 29201

803-251-7442

Counsel for Adger Solar, LLC.

March 9, 2017

Columbia, South Carolina

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THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2016-8-E

IN RE: Duke Energy Progress, LLC's
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CERTIFICATE OF SERVICE

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have served copies of the Cover Sheet, Petitioner, Adger Solar, LLC's Petition to Intervene and this Certificate of Service, as indicated below, via electronic mail on March 9, 2017.

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/S/ _____
Carrie A. Schurg

March 9, 2017
Columbia, South Carolina